



Memorandum

Morris Township, New Jersey

Date: October 4, 1988
To: Mr. R. P. Viarengo, President
From: Ralph L. Rhodes
Subject: Pollution Control Review
Fluorglas, Hoosick Falls, New York

Enclosed is a report summarizing the findings of our review of the Pollution Control programs at the Hoosick Falls Plant in July 1988. The review was conducted as a part of the Corporate Health, Safety and Environmental Surveillance Program.

It is suggested that a written response to the report be prepared indicating action anticipated in response to each finding. Please provide me with a copy of the action plan.

A handwritten signature in cursive script, appearing to read 'Ralph L. Rhodes'.

Ralph L. Rhodes
Director, Surveillance
Corporate, Health, Safety,
and Environmental Sciences

Attachment

cc: E. W. Callahan
R. P. Callahan
G. E. Crawford
J. L. Greeno
C. J. Hare
M. Heth ✓
T. D. Kent
W. Noonan
J. Plaut
F. M. Poses
L. R. Taunton
W. E. Yanovitch

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HOOSICK FALLS, NEW YORK
FLUORGLAS
ENGINEERED MATERIALS SECTOR
POLLUTION CONTROL REVIEW

I. Background

A. Purpose:

The review was performed as a part of a series of reviews conducted at selected locations in 1988 by health, safety and environmental surveillance teams. Their objective is to provide management of the Corporation with verification that health, safety and environmental programs are conducted in compliance with Allied-Signal Policy and procedures and federal, state, and local laws and that systems are in place to provide for continued compliance.

B. Review Scope:

The review scope was limited to the conduct of the location's Pollution Control programs at Fluoroglas operations during the period January 1, 1987 through July 28, 1988. Plants included in the review were: McCaffrey Street, Liberty Street, John Street, River Road I and River Road II

The review was conducted in conjunction with Pollution Control reviews at other Engineered Materials Sector operations in Hoosick Falls during the week of July 25, 1988.

C. Conduct of the Review:

The review was conducted on July 25 through 28, 1988 by a team composed of Ralph L. Rhodes, Corporate Health, Safety and Environmental Sciences and J. Thomas Fitch, Arthur D. Little, Inc. Richard P. Callahan and Dana Hawkins also participated in the review on behalf of Fluorglas and the Engineered Materials Sector, respectively. The team leader was Ralph L. Rhodes.

D. Report Scope:

The purpose of this report is to communicate all deficiencies noted in the course of the review which in our opinion have particular interest to management. These and other less significant deficiencies have been discussed with William Noonan, Vice President & General Manager and other plant and sector personnel. All deficiencies are documented in the review working papers.

Findings related to regulatory standards are based on our understanding of the standards and their application to the Hoosick Falls Plants during the review period. They have not received a detailed legal review.

II. Verification - Regulatory Standards:

A. Findings:

On the basis of our review, we believe that the Pollution Control programs at the location comply with federal, state and local regulations, except as follows:

B. Exceptions:

1. The scrubber installed to control emissions from McCaffrey Street fabric coating operations is not operated.
2. The practice of burning off residue in McCaffrey Street stacks constitutes open burning which is prohibited by state air pollution control regulations.
3. Waste water from cleanup of the spray-coater at the John Street plant is discharged to the ground under the building.
4. A drum of dichloro benzyl peroxide catalyst was noted in the Liberty Street hazardous waste storage area. The material had been in storage considerably longer than the 90 days allowed. It has not been analyzed to identify hazardous constituents. The circumstances under which it was created give reason to suspect that it may contain PCB.
5. The RCRA Contingency Plans for the manufacturing locations are:
 - general in their content and do not contain some detailed information of importance in emergency response.
 - not fully up to date as to designated emergency coordinators.
6. A formal waste minimization program has not yet been implemented.
7. Information on registration certificates obtained pursuant to state bulk oil storage regulations is not fully accurate as to number of tanks and tank volumes.
8. The accumulation of waste solvent from the Liberty Street Can-Line operation stack constitutes "satellite storage" under RCRA rules. The drum is not appropriately labeled.

9. Discharge monitoring reports submitted to the Department of Environmental Conservation reporting dissolved solids in the effluent from the River Road etching operation were incorrect for several years. The data provided was based on analysis for sodium not dissolved solids.

III. Verification - Allied-Signal Inc. Policy & Procedures

A. Findings:

With the exception of findings noted in Section II and the following, the review did not reveal any significant departure from the provisions of Corporate Policy or Corporate, Sector, or Plant procedures.

B. Exceptions:

1. The Allied-Signal Health Safety and Environmental Policy is not displayed at all plants.
2. Solvent Recovery Systems of New England, the hazardous waste disposal contractor has not been inspected and approved for use by Allied-Signal plants.
3. A formal delegation of authority for the signature on state waste water discharged permit applications and monitoring reports could not be located.

IV. Control System Observations:

- A. Our review did not reveal any significant deficiencies in plant control systems to provide for continued compliance with regulations and/or Allied-Signal Policy and procedures which were not summarized in Sections II & III, except as follows:

B. Exceptions:

No exceptions were noted.



Ralph L. Rhodes